

GIBSON DUNN

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BY ECF

May 14, 2021

The Honorable Loretta A. Preska
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *United States v. Donziger*, No. 19-cr-561 (S.D.N.Y.)

Dear Judge Preska:

I write as counsel for non-parties William E. Thomson and Gibson, Dunn & Crutcher LLP (“Gibson Dunn”) to inform the Court that Gibson Dunn (not Chevron Corporation) is paying for all travel expenses relating to Mr. Thomson’s trips to New York, including the costs of both roundtrip flights. Enclosed is a declaration from Amy E. Mowen in Gibson Dunn’s accounting department verifying under oath that Gibson Dunn is paying for all of Mr. Thomson’s travel expenses. When testifying, Mr. Thomson mistakenly believed that Chevron would be paying for the costs of his flights and travel expenses for purposes of traveling from Los Angeles to New York to testify at the trial in August 2020 and in May 2021. We have made sure, however, that Gibson Dunn is bearing all the costs associated with any of its partners subpoenaed to testify, including their time preparing for meetings with the Special Prosecutors, meetings with the Special Prosecutors, preparing for trial, and testimony at trial, and including any and all travel expenses relating to their appearance at trial. As reflected in the attached declaration, Gibson Dunn is paying for all of Mr. Thomson’s travel expenses for both trips.

Sincerely,

/s/ Reed Brodsky
Reed Brodsky